

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Policies and Rules Pertaining to)
Local Exchange Carrier "Freezes")
on Consumer Choices of Primary)
Local Exchange or Interexchange)
Carriers)

RM-9085
CCB/CPD 97-19

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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MOTION TO ACCEPT LATE-FILED COMMENTS

Pursuant to section 1.46 of the Commission's rules, the Ameritech Operating Companies (Ameritech) respectfully request that the Commission accept the attached comments, which are filed one-day late. Ameritech was unable to file these comments on the date they were due because of a problem with its courier service, which despite repeated assurances to the contrary, neglected to pick up the filing at Ameritech's offices for delivery to the Commission on a timely basis.

Ameritech has hand-delivered a copy of these comments to MCI, International Transcription Services, and to William Bailey of the Competitive

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Pricing Division, Common Carrier Bureau. Therefore, no party will be prejudiced by this one-day delay.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Gary L. Phillips". The signature is written in dark ink and is positioned above a horizontal line.

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June 5, 1997

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AMERITECH COMMENTS

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AMERITECH COMMENTS

I. INTRODUCTION AND SUMMARY

The Ameritech Operating Companies (Ameritech) respectfully submit the following comments on the above-captioned petition for rulemaking filed by MCI on March 18, 1997. In this petition, MCI asks the Commission to adopt rules governing so-called "PIC freezes." PIC freezes are restrictions that customers may place on their local exchange carrier (LEC) records to protect themselves against slamming.¹ A customer that has elected a PIC freeze for a particular type of service will not be switched to a different provider of that type of service without personally authorizing such change. PIC freezes can be used by customers to protect their local service, their local toll service and/or their

¹ "Slamming" is a term used to describe any practice by which a consumer's provider of a telecommunications service is changed without the consumer's knowledge and consent.

long-distance service, although Ameritech currently makes it available only in connection with local toll and long-distance services.²

In its petition, MCI generally takes a dim view of this consumer protection mechanism, at least when it is used to protect customers of MCI's competitors in the local toll markets.³ Indeed, the caption chosen by MCI for its petition – which characterizes slamming protection as a freeze on consumer choice – aptly telegraphs MCI's viewpoint. MCI, though, has it wrong. Slamming protection does not act as a freeze on consumer choice; it protects consumer choice. It does not impede competition; it allows competition to work the way it is supposed to.

The Commission itself has recognized the benefits to consumers of slamming protection. In the most recent edition of the Common Carrier Scorecard, the Commission advises consumers to avail themselves of slamming protection if they want to make sure that their service is not changed without

² In this respect, the term "PIC freeze" is a misnomer insofar as the reference to "PIC" (presubscribed interexchange carrier) implies that the freeze can be placed only on the customer's choice of interexchange carrier. The term is also misleading in that it implies that the customer's account is "frozen." In fact, the customer remains free to switch carriers as often as he/she likes; the only requirement is that the customer personally authorize his local exchange carrier to make the switch. Because the term PIC freeze is thus not descriptive of the service, Ameritech uses the term "slamming protection" instead in these comments.

³ MCI, though, itself has recently asked Ameritech to process slamming protection requests that MCI solicits from its customers. Ameritech has agreed and has been working with MCI to devise a form that is clear and accurate for distribution to MCI's customers.

their knowledge or consent.⁴ Having recognized the benefits to consumers of slamming protection, the Commission should ensure that those benefits are widely available and that slamming protection continues to be an effective consumer protection mechanism. To the extent MCI's proposals are inconsistent with these goals - and for the most part they are - those proposals should be rejected.

II. BACKGROUND

The Commission first began receiving slamming complaints after the entry of multiple competitors into the long distance telephone marketplace following the divestiture of AT&T.⁵ Since then, slamming has become an increasingly serious consumer problem. It is now the largest source of consumer complaints in the common carrier area, accounting for 34% of all such complaints, according to the most recent statistics available.⁶ Moreover, despite a series of orders throughout the early 1990s in which the Commission attempted to address the slamming problem, the number of slamming complaints has continued to skyrocket. According to the Common Carrier

⁴ Common Carrier Scorecard, FCC, Common Carrier Bureau, Enforcement and Industry Analysis Divisions, Fall 1996 at 7 (Common Carrier Scorecard).

⁵ Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, 10 FCC Rcd 9560, 9561 (1995) (Slamming Order).

⁶ Common Carrier Scorecard at 14.

Scorecard, the number of slamming complaints filed at the Commission has more than tripled since 1994.⁷

Just as the FCC has been inundated with slamming complaints, so too have state authorities. For example, in 1995, the Illinois Attorney General's office reported that slamming had become the number one source of consumer complaints of any kind in Illinois, bypassing for the first time such perennial sources of consumer complaints as home and car repairs.

These consumer complaints, however, are just the tip of the iceberg. Undoubtedly most consumers who are slammed do not file complaints with state or federal regulators. Some of them do nothing at all; some call their local telephone company to complain. Ameritech itself received more than 23,000 slamming complaints directly from consumers in 1995. During the first five months of 1997, it has already received over 35,000 consumer complaints!⁸

⁷ Id. at 3. See also Slamming Order at 9561-63.

⁸ MCI has hardly been innocent of slamming. Last year, the Commission issued a Notice of Apparent Liability against MCI in which it found that "MCI apparently willfully or repeatedly violated Commission rules and orders" with respect to PIC changes. See Notice of Apparent Liability for Forfeiture, MCI Telecommunications Corp., 11 FCC Rcd 1821 (1996). MCI and the Commission have since entered into a consent decree regarding those violations. In addition, MCI has settled a complaint case in the Florida Public Service Commission involving 192 slamming complaints against MCI. Order Approving Offer of Settlement, Investigation of MCI Telecommunications Corporation Marketing Practices, Fla. PSC Dkt. 960186-TI (March 8, 1996).

The pervasiveness of slamming has gained the attention of regulators and state attorneys general around the country. It has also garnered significant media attention. Typical is the following observation of the Wall Street Journal: “Slamming has become a seemingly unstoppable nationwide scourge. . . . It is a blatant form of fraudulent activity.”⁹

Unfortunately, the slamming problem is only likely to worsen as new telecommunications markets are opened to competition. Indeed, slamming is already becoming pervasive in the intraLATA toll market as carriers take advantage of customer confusion regarding the differences between local service, local toll service, and long-distance service. This was disturbingly evidenced in a recent survey that Ameritech conducted of customers in Michigan and Wisconsin. The survey showed that approximately half of the customers whose presubscribed intraLATA toll service was changed did not believe that they had authorized such change and did not intend to make it.¹⁰

The survey results are corroborated by data Ameritech has compiled regarding slamming complaints received directly from consumers thus far this year. Of the more than 35,000 slamming complaints Ameritech has received from customers thus far, more than 40% involved slamming of intraLATA toll

⁹ Wall Street Journal, July 26, 1995 at Section A, page 1.

service.¹¹ Given that intraLATA toll presubscription has not even been implemented in two of Ameritech's five states (Ohio and Indiana), and given that intraLATA toll slamming is likely to be less evident to customers than long-distance slamming, these numbers are alarming indeed. Certainly, as intraLATA toll dialing parity is implemented throughout the country – along with local dialing parity – the incidence of slamming will increase exponentially.

It is in this context that MCI's petition must be viewed. While MCI complains that slamming protection imposes additional burdens on MCI marketing personnel, slamming protection is, in fact, the only means by which customers can be protected from slamming before it happens. By giving customers the right to insist that they personally authorize any change in their account, slamming protection empowers consumers and protects the foundation of real competition: informed consumer choice.

To be sure, slamming protection requires an additional step in order to effect a PIC change – the communication by the customer to the LEC of his/her consent to the change. But this is precisely why customers elect slamming protection, and this is why it can be an effective source of protection against fraud. To argue, as does MCI, that this step "acts as a block to the typical

¹⁰ A copy of this survey and testimony explaining how the data was gathered is attached as Exhibit A.

method of executing customer switches of service” is to miss the point entirely. The typical methods of executing PIC changes today have resulted in rampant fraud. Customers ought to have the right to protect themselves against this fraud, and the additional step is what confers this protection.

MCI alleges, further, that, with the implementation of intraLATA toll dialing parity in three of its states, Ameritech “began aggressively to make it harder for [its] customers to change carriers for intraLATA and interLATA toll services through the use of PIC freezes.”¹² The implication is that Ameritech has just recently begun offering slamming protection and that Ameritech imposes this protection on customers against their will. Both of these allegations are demonstrably false. First, the “aggressive” action to which MCI refers consisted of a bill insert in December 1995 informing customers of their right to elect slamming protection. Ameritech did not make it harder for customers to switch carriers; it informed customers of their rights and left it to customers to decide whether to exercise those rights. Second, Ameritech did not implement slamming protection on the eve of intraLATA toll dialing parity. It has been offering slamming protection to its customers since 1986. Because slamming was not at that time the pervasive problem it has now become, Ameritech did not then actively market slamming protection, and the option was chosen primarily

¹¹ See Exhibit B.

¹² MCI Petition at 3.

by customers who had been slammed. As the incidence of slamming increased, however, so, too, did customer demand for slamming protection. To illustrate, in July 1993, only about 35,000 Ameritech Illinois customers had slamming protection, even though that option had then been available for seven years. Only sixteen months later, in November 1995 - without any promotion of slamming protection by Ameritech whatsoever - that number had risen to nearly 200,000, an increase of more than 450 percent. It is in this context that Ameritech decided to inform customers generally of the availability of slamming protection. Ameritech did so in December 1995 by sending its customers a bill insert.¹³

Ameritech does not deny that concern over the likelihood of rampant slamming of intraLATA toll customers played a role in this decision – along with the obvious need and desire of customers for protection against all forms of slamming. This, however, was not anticompetitive. For one thing, history has validated Ameritech's concern that its intraLATA toll customers would be especially vulnerable to slamming, as Ameritech's customer survey and its tracking of customer slamming complaints makes clear. For another, Ameritech

¹³ While MCI asserts that this insert did not adequately explain slamming protection to customers, MCI does not claim that any materials currently used by Ameritech in connection with slamming protection are in any way incomplete or deficient. Indeed, MCI's criticism of this billing insert is ironic insofar as MCI is currently using slamming protection forms that deviate significantly from the standards MCI espouses in its petition and that are clearly incomplete and misleading.

resolutely rejects the notion that slamming protection, in and of itself, could ever be deemed anticompetitive. Rather, to give customers the option of protecting themselves against what has become a pervasive form of fraud is good for customers and good for competition.¹⁴

III. RULES ADOPTED BY THE COMMISSION SHOULD PROTECT AND EXPAND THE CONSUMER BENEFITS OF SLAMMING PROTECTION.

Because slamming is a significant and growing form of consumer abuse, Ameritech believes it is critical that consumers continue to have the option to obtain slamming protection. At the same time, Ameritech recognizes that slamming protection must be properly and fairly implemented and marketed. In particular, it is imperative that: (1) consumers be fully informed of their rights and obligations when they elect slamming protection; (2) there be simple, but secure, procedures by which consumers may lift the slamming protection they have elected; and (3) local exchange carriers offering slamming protection make

¹⁴ MCI makes much of the regulatory orders of the Illinois and Michigan Public Service Commissions regarding the propriety of Ameritech's December 1995 billing insert. Both decisions were narrow, split decisions that generated vigorous dissents. The Illinois decision was issued by a two-member plurality (out of five), with the deciding vote cast by a commissioner who concurred in the result, but neither joined in the decision nor issued a decision of his own. The Michigan decision was decided by a 2-1 vote. In dissent, Chairman Miller of the Illinois Commerce Commission described the plurality's decision as "irrational," "ill considered," "murky" and demonstrative of the "hubris typical of the overzealous regulator." Commissioner Shea of the Michigan Commission asserted, *inter alia*, that the decision was supported by no evidence whatsoever. Both decisions are currently on appeal.

MCI also neglects to mention that the Wisconsin Public Service Commission, like the FCC, has advised consumers to avail themselves of slamming protection in order to protect themselves against fraud. See Exhibit C.

it available on the same terms and conditions to all of their local exchange customers, regardless of which carriers those customers use for their toll services. These three consumer-oriented principles should be the touchstone of any Commission rulemaking in this area.

Unfortunately, the rules proposed by MCI do not generally reflect these principles. In some respects, the proposed rules are too vague; in others they are unnecessary and even contrary to the interests of consumers. Ameritech discusses each of MCI's proposals below.

A. MCI's Proposed Section 64.1200(a) is Vague and Overbroad

MCI proposes, first, that carriers be "prohibited from engaging in any practices, including soliciting, marketing, or employing PIC freezes or other carrier restrictions that have the purpose or effect of impeding competition or unreasonably restricting customer choice."¹⁵ It is not clear to Ameritech what types of practices could fall within this rule. Ameritech assumes that MCI does not intend for this rule merely to restate existing antitrust law, since there would be no purpose in such a rule. Rather, it would seem that MCI intends for this rule to broaden existing antitrust laws to some unexplained extent.¹⁶ For

¹⁵ See MCI petition at 8, proposing new section 64.1200(a) to Commission rules.

¹⁶ It is noteworthy, in this regard, that MCI proposes this rule almost as an appendage to its petition, without any accompanying discussion of precisely what this rule means, how it

example, MCI would undoubtedly argue that the rule prohibits LECs from offering slamming protection to their intraLATA toll customers, despite the fact that such an argument would find no support in the antitrust laws. Others might take the cue and argue that the rule prohibits AT&T – with about 53% of interstate toll revenues and almost 65% of all presubscribed lines - from offering slamming protection. Indeed, an argument could be made that slamming protection by any interexchange carrier, including MCI, would have the “effect” of impeding competition, given that Bell operating companies will, for the first time, be permitted to offer in-region interLATA services.

The Commission should not go down this path. For one thing, given that intraLATA toll slamming is occurring at rates that dwarf long-distance slamming rates, any rule that could be misused to call into question the validity of intraLATA toll slamming protection would clearly be contrary to the public interest. It would turn slamming protection into just another object of regulatory gamesmanship by which carriers jockey for position in the marketplace. The Commission would be inundated with claims by carriers who seek to afford their own customers slamming protection, but who would deny the customers of their competitors the same right.

relates to MCI's previous discussion of slamming protection, and how it would apply on ongoing basis.

The losers in this game would be consumers. At a time when slamming is on the rise and is likely to escalate further, consumers would be left on the sidelines, the unwilling pawns in the competitive battles of carriers, such as MCI, who seek only to turn slamming protection rules into a source of competitive advantage.

It is in this respect that MCI's proposed rule misses the mark. MCI ignores that, fundamentally, slamming protection is and should remain a consumer issue. It ignores that a customer of Ameritech has every bit as much interest in protecting him or herself from slamming as a customer of MCI or some other carrier. That consumer does not care whether Ameritech is the largest provider in the marketplace or the smallest; he or she simply wants protection from an abuse that is, unfortunately, far too prevalent. MCI's rule is flawed because it focuses exclusively on carriers, when it is the interests of consumers that should be paramount.

This is not to say that the competitive implications of slamming protection programs are of no concern whatsoever to the Commission. Surely a program that goes beyond the legitimate interest of effectively protecting consumers and that unnecessarily impedes competition ought not be permitted. The Commission does not need a new rule, however, to guard against such misconduct. Section 201(b) of the Communications Act already prohibits

unreasonable practices, and that provision is available in the event a slamming protection program is implemented in an anticompetitive and unreasonable manner. Antitrust laws are also available to complainants in the event of any anticompetitive activities. There is no reason why these remedies are not sufficient to protect against any potential abuses in the implementation of slamming protection programs.

B. The Commission Should Establish Specific Rules to Ensure that Solicitations of Slamming Protection are not Deceptive or Misleading

MCI's proposed Section 1200(b)(1) provides that carriers or their agents may not acquire a PIC freeze "through consumer solicitations that are deceptive or misleading."¹⁷ Ameritech agrees with the sentiment underlying this proposal but, in keeping with its view that slamming protection rules should be consumer oriented, suggests that MCI's proposed rule is too vague and does not go far enough. Just as the Commission prescribed minimum requirements for letters of agency used to authorize a change in a consumer's primary long-distance company,¹⁸ the Commission should prescribe minimum informational requirements for slamming protection solicitations, whether those solicitations occur orally or in writing. Specifically, the Commission should require that slamming protection solicitations meet four requirements. First, any solicitation

¹⁷ MCI Petition at 8.

¹⁸ Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, 10 FCC Rcd 9560 (1995) (LOA Order).

should clearly explain what slamming protection is and the abuse to which it is directed. Second, solicitations should clearly indicate the services that would be covered – *i.e.*, whether the protection applies to local exchange, local toll, and/or other toll services. A statement that all of a customer's services would be covered would also suffice, provided, of course, that the statement is accurate. Third, customers must be informed of precisely how they may remove slamming protection from their account. If a carrier requires that a customer personally authorize removal of slamming protection – either orally or in writing – they must be so informed. They should also be told how such personal authorization may be provided, by, for example, indicating telephone numbers, addresses, or any special procedures that can be used by customers to lift slamming protection. Fourth, customers should be informed of any charge associated with placing or lifting slamming protection from their account.

C. MCI's Proposed {1200(b)(2) is Too Vague and Unnecessary

MCI's proposed {1200(b)(2) provides that when carriers solicit customers for slamming protection, they may "in no way or manner favor any affiliated carrier."¹⁹ This proposed rule, like most of others suggested by MCI, is far too cryptic and open-ended. Ameritech can only guess as to its meaning.

¹⁹ MCI Petition at 9.

One possible interpretation, however, (and one that Ameritech suspects MCI would advance) is that this rule would preclude a Bell operating company that sells the long-distance service of its affiliate pursuant to section 272(g)(2) of the 1996 Act from informing customers during a sales contact of the availability of slamming protection. Any such restriction would clearly be contrary to the public interest since customers of LEC affiliates have just as much right to information about slamming protection as other customers. It would also be wholly unnecessary. Since LECs are permitted to market and sell local, local toll, and long-distance services to such customers, there is no reason why they should be prohibited from marketing slamming protection to them. Finally, such a rule would be grossly unfair since, as written, it would not apply to incumbent interexchange carriers, who need not offer services through a separate affiliate.

Regardless of whether the rule could be so applied, there is absolutely no reason to adopt a nondiscrimination standard specific to slamming protection in any event. Section 202 of the Communications Act already prohibits any common carrier from engaging in unjust and unreasonable discrimination. Additionally, section 272(c)(1) prohibits Bell operating companies from discriminating in favor of their affiliate in the provision or procurement of, *inter alia*, any service. The Commission has expounded in detail on the operation of

section 272(c)(1) in the Non-Accounting Safeguards Order.²⁰ It has expounded on section 202 over the past 63 years. These provisions, as interpreted and/or applied by the Commission, are more than adequate to address any discrimination that may occur with respect to slamming protection. Indeed, to adopt a new and different nondiscrimination standard specifically for slamming protection would only confuse matters.

If the Commission nevertheless deems it necessary to issue rules explaining how these nondiscrimination requirements apply in the context of slamming protection, it should adopt rules that are specifically crafted and that are consistent with statutory standards. For example, the Commission could consider requiring LECs who offer slamming protection when selling their own long-distance services (or that of their affiliate) to offer slamming protection, as well, to a customer that contacts the LEC to sign up for intraLATA toll or interLATA service with an unaffiliated carrier. Likewise, the Commission could make it clear that LECs who offer slamming protection must make that service available on nondiscriminatory terms and conditions to all customers whose PIC the LEC controls, regardless of the carrier to which those customers are presubscribed. Under such a rule, a LEC could not limit slamming protection to

²⁰ Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act, as amended, CC Docket No. 96-149, FCC 96-489, First Report and Order, released December 24, 1996.

its own customers or provide them a different slamming protection service than it makes available to intra or interLATA toll customers of other carriers.

If the Commission adopts this second nondiscrimination requirement, however, it should explicitly recognize at least one context in which the rule cannot now apply. Currently, customers who elect slamming protection may not be protected against slamming if they use, or are slammed by, a switchless reseller. That is because, at present, the PIC information in LEC switches is the same for a switchless reseller as it is for the underlying facilities-based carrier. Thus, LECs often are not even notified if a customer switches between a facilities-based carrier and one of its switchless resellers: since the routing of the call is the same from the LEC's perspective, there is no need for any switch reprogramming. Moreover, even if the LEC is notified, the notification appears to the LEC to be entirely consistent with the slamming protection programmed into the LEC switch.

Ameritech is currently discussing with various industry members possible solutions to this problem. Until a solution is identified and implemented, however, LECs cannot guarantee customers that they will be protected from an unauthorized PIC change between a facilities-based carrier and its switchless reseller. Any nondiscrimination obligation adopted by the

Commission, pursuant to which LECs have an obligation to protect all customers equally, therefore, should not extend to this situation.

D. MCI's Proposal that LECs Furnish Lists of Customers Who Have Elected Slamming Protection is Reasonable Provided That Carriers are Prohibited From Using Such Lists to Identify Customers as Telemarketing Targets.

MCI also proposes that the Commission require LECs to furnish to any requesting carrier the name and telephone number of all consumers who have in effect slamming protection and/or local, intraLATA, or interLATA carrier restrictions on their account. According to MCI, this information is necessary so that MCI telemarketers can determine on a real-time basis whether it is necessary for customers to whom they sell MCI service to lift their slamming protection or other restrictions.

Ameritech believes that this proposal serves the interests of customers and Ameritech is prepared to provide such lists to other carriers. LECs, of course, should receive reasonable compensation for maintaining and updating the databases containing the relevant information and for making this information available.

Ameritech does have one concern, however, with this proposal. Unless specifically restricted from doing so, carriers may use these lists to identify

customers as telemarketing targets. Many customers have indicated considerable displeasure with the number of telemarketing contacts they receive.²¹ Ameritech is concerned that these lists could generate additional, unwelcome contacts, and that customers might blame the LEC that supplied the list for such contacts. Therefore, just as the Commission prohibits the use of billing name and address (BNA) for marketing purposes,²² so too should it prohibit carriers from using lists of customers with slamming protection to identify customers as telemarketing targets. The Commission should also make it clear that a violation of this restriction will result in sanctions, including, potentially, disqualification from receiving future lists.

E. Existing Third Party Verification Procedures are Part of the Problem: They Should Not be Used to Lift Slamming Protection

The last rule proposed by MCI would require LECs to:

[c]o-operate with other carriers and affected consumers in any reasonable manner to remove an existing PIC freeze or carrier restriction so that a new carrier can replace a current carrier as promptly as possible. This co-operation must include offering the functionality to conduct a three-way telephone conference between the consumer, the current carrier, and the new carrier, the receipt and efficient processing of written or oral consumer requests to unfreeze the PIC or to remove the carrier restriction; or any other reasonable method designed to implement promptly the consumer's right to choose from among competing carriers. Third party verification of a consumer's request to switch carriers in

²¹ So common are telemarketing contacts by telecommunications providers that the television show, "Seinfeld" has spoofed the subject.

²² See 47 CFR § 1201.

compliance with Section 64.1100 of the Commission's rules is sufficient to remove a PIC freeze or carrier restriction.

Ameritech has no problem with this proposed rule, except for the last sentence. Third party verification of PIC changes has not been effective in preventing slamming. This much is clear from the escalating number of slamming complaints. To rely on third party verification, therefore, as a channel for lifting slamming protection would undermine the efficacy of that protection.

The most obvious danger of relying on third party verification to lift slamming protection is that it in no way ensures that customers actually understand the nature of the PIC change to which they have allegedly agreed. Unless third party verifiers use prescribed scripts that clearly lay out the differences between long-distance, local toll, and local exchange services, customers may agree to one type of switch and find that they have actually made another. As Ameritech's customer survey, discussed above, makes clear, this problem is already widespread despite the use of third party verifiers in connection with PIC changes.

There are also other potential problems with third party verification. For example, Ameritech has received reports that at least one of MCI's third party verifiers receives incorrect information from MCI regarding the PIC-change being verified. That third party verifier is told by MCI that the customer in

question has authorized an intraLATA toll PIC change, even when the customer has expressly declined to make such a change during his/her conversation with MCI's sales representative. Customers, some of whom do not listen carefully to the third party verifier, then find that they have "verified" a PIC change to which they did not agree. To permit the lifting of slamming protection based on third party verification would therefore render that protection ineffective.

Ameritech believes that there are other, better ways to streamline the process for lifting slamming protection – ways that would not compromise the efficacy of that protection. A three-way call, which is an option Ameritech currently offers, is one obvious example. In addition, Ameritech is developing a new procedure by which customers may lift their slamming protection simply by calling a 24-hour number, entering their account number or, possibly, other customer-identifying information, and then follow a recorded voice prompt to indicate their intentions. That prompt will instruct callers to press different digits, depending upon the service or services for which they wish to remove slamming protection. Ameritech believes it will be far less subject to abuse than existing third party verification procedures which in no way guarantee a fair and accurate verification process. Ameritech is also prepared to work with other members of the industry to devise additional secure, customer-friendly mechanisms for lifting slamming protection.